

Susan Stott  
30 Pasho St.  
Andover, MA 01810  
March 21, 2012

Kathleen Baskin, P.E. (Kathleen.Baskin@state.ma.us)  
Director of Water Policy and Planning  
Executive Office of Environmental Affairs  
100 Cambridge Street  
Boston, MA

Dear Ms. Baskin,

I am writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. I am a day kayaker and love the rivers in this part of Massachusetts. When I have two hours I paddle up the Shawsheen River from the Ballardvale Dam in Andover, when I have longer my favorite paddle is upstream on the Ipswich River into the Ipswich River Wildlife Sanctuary in Topsfield and at other times I put in at the Lowell Rd. bridge in Concord and paddle up the Sudbury or Assabet. Late in the summer these rivers are so low you can sometimes not paddle through.

I appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed. The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry; this is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for the opportunity to comment.

Sincerely,

Susan Stott